

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC # _____ DATE FILED: <u>4/1/10</u>

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

**FTC Capital Markets, Inc.,
FTC Emerging Markets, Inc., also d/b/a FTC Group,
Guillermo David Clamens,
Lina Lopez a/k/a Nazly Cucunuba Lopez,**

Defendants.

ECF Case

09 Civ. 4755 (PGG)

STIPULATION AND ~~PROPOSED~~ ORDER

It is hereby stipulated and agreed that in connection with the Stipulations and Orders entered on December 15, 2009, and March 24, 2010, the following additional actions be taken to facilitate winding down the business operations of FTC London UK Ltd. so that the remaining balances in the following accounts at Coutts Bank, 440 Strand, London WC2R 0QS, held in the name of FTC London UK Ltd., can be transferred to the United States: (1) Account No. 00176915, sort code 1-80000-2; (2) Account No. 00176907, sort code 1-80000-2; and (3) Account No. 10381309, sort code 1-800-91 (the "Accounts").

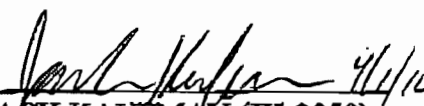
In addition to the amounts previously authorized for payment to Reed Smith by the Court's December 15, 2009 and March 24, 2010 Orders, Guillermo David Clamens and FTC London UK Ltd. are expressly authorized by the parties and directed by the Court to make additional payments as required from the Accounts, not to exceed an additional £25,000, to Reed Smith for the sole purpose of representing FTC London UK Ltd. regarding claim number

CL985029 filed in Central London County Court by former FTC London UK employee Marielle Lukaczyn, including any litigation concerning Ms. Lukaczyn's recent application (on or about March 31, 2010) for a freezing order by the High Court of Justice concerning the Accounts or their contents.

Stipulated And Agreed To By:

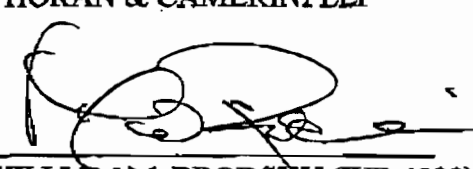
SECURITIES AND EXCHANGE
COMMISSION

By:

 4/1/10
JACK KAUFMAN (JK-3050)
RHONDA JUNG (RJ-3864)
Attorneys for Plaintiff

FOX HORAN & CAMERINI LLP

By:


WILLIAM M. BRODSKY (WB 4398)
V. DAVID RIVKIN (VR 6734)
Attorneys for Defendants

SO ORDERED:


HONORABLE PAUL G. GARDEPHE
UNITED STATES DISTRICT COURT JUDGE

April 1, 2010
New York, New York